

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE SATANIC TEMPLE, INC. :
:
v. Plaintiff, :
: Case No. 1:22-cv-01343-MKV
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NEWSWEEK DIGITAL, LLC : **Declaration of**
: **Cameron Stracher**
:
Defendant. :
:
:
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Pursuant to 28 U.S.C. § 1746, Cameron Stracher declares:

1. I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of the facts herein.

2. I am an attorney with the law firm of Cameron Stracher, PLLC, counsel for Defendant Newsweek Digital, LLC (“Newsweek”). I submit this declaration in support of Newsweek’s Motion for Summary Judgment.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the transcript of the Deposition of Lucien Greaves, dated November 6, 2023.

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the transcript of the Deposition of Gregory Stevens, dated November 3, 2023.

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the transcript of the Deposition of Julia Duin, November 16, 2023.

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the transcript of the Deposition of Nathan Sullivan, November 17, 2023.

7. Attached hereto as **Exhibit 5** is a true and correct copy of an email sent from Kevin Jones on September 29, 2021, produced by Julia Duin in response to a subpoena and bearing Bates stamps JDUIN001–003.

8. Attached hereto as **Exhibit 6** is a true and correct copy of social media messages exchanged between Julia Duin and the social media account @queersatanic, produced by Julia Duin in response to a subpoena and bearing Bates stamps JDUIN019–025.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a portion of the transcript of an audio recording of Julia Duin’s interview with members of Queer Satanic, produced by Julia Duin in response to a subpoena and bearing Bates stamp JDUIN018.

10. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the transcript of the Deposition of David Johnson, November 17, 2023.

11. Attached hereto as **Exhibit 9** is a true and correct copy of an email exchange between Julia Duin and Scott Malphas in October of 2021, produced by Newsweek during discovery and bearing Bates stamps DUIN48-001–48-005 and introduced during the Deposition of Julia Duin as Plaintiff’s Exhibit 10.

12. Attached hereto as **Exhibit 10** is a true and correct copy of an email exchange between Julia Duin and Jinx Strange in October of 2021, produced by Newsweek during discovery and bearing Bates stamps NEWSWEEK015–017 and introduced during the Deposition of Julia Duin as Plaintiff’s Exhibit 2.

13. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from the transcript of the Deposition of Paul Millirons (aka Jinx Strange), dated December 7, 2023.

14. Attached hereto as **Exhibit 12** is a true and correct copy of an email exchange between Julia Duin and Lucien Greaves in October of 2021, produced by Newsweek during discovery and bearing Bates stamps NEWSWEEK027–031.

15. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from the transcript of the Deposition of Nancy Cooper, November 7, 2023.

16. Attached hereto as **Exhibit 14** is a true and correct copy of an email sent from Julia Duin to Nancy Cooper on October 28, 2021, produced by Newsweek during discovery and bearing Bates stamps COOPER48–50 and introduced during the Deposition of Nancy Cooper as Plaintiff's Exhibit 12.

17. Attached hereto as **Exhibit 15** is a true and correct copy of the article titled “The Struggle for Justice is Ongoing” by Jex Blackmore, available on www.medium.com.

18. Attached hereto as **Exhibit 16** is a true and correct copy of an excerpt from Dr. Joseph Laycock's book *Speak of the Devil: How The Satanic Temple is Changing the Way We Talk about Religion*, produced by Newsweek during discovery and bearing Bates stamps NEWSWEEK190–193.

19. Attached hereto as **Exhibit 17** is a true and correct copy of notes prepared by Gregory Stevens in preparation for his deposition and introduced during his deposition as Defendant's Exhibit 3.

20. Attached hereto as **Exhibit 18** is a true and correct copy of social media posts by Rumor Solanine dated May 2, 2021.

21. Attached hereto as **Exhibit 19** is a true and correct copy of Facebook posts by D.E.M. dated March 8, 2020.

22. Attached hereto as **Exhibit 20** is a true and correct copy of a Reddit thread pertaining to former members of The Satanic Temple dated February 15, 2020.

23. Attached hereto as **Exhibit 21** is a true and correct copy of a Facebook post dated September 11, 2020 produced by Plaintiff during discovery and bearing Bates stamp TST000430 and introduced during the Deposition of Gregory Stevens as Defendant's Exhibit 19.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 17, 2024



Cameron Stracher

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2024, I caused a true copy of the foregoing to be served on all counsel of record via ECF.

/s/ Sara C. Tesoriero
Sara C. Tesoriero, Esq.